

750 W. 2nd Avenue
Suite 206
Anchorage, AK 9950



907.258.0224 Telephone
904.258.0223 Facsimile
www.oceanconservancy.org

Ted A. Murphy, Acting State Director, Alaska
Stephanie Rice, Planning and Environmental Coordinator
Bureau of Land Management
222 West 7th Avenue, Mailstop #13
Anchorage, Alaska 99513

Re: Notice of Intent to Prepare an Integrated Activity Plan and Environmental Impact Statement for the National Petroleum Reserve in Alaska

ONLINE SUBMISSION via <http://www.blm.gov/alaska/NPR-A-IAP-EIS>

January 30, 2019

Dear Acting Director Murphy and Ms. Rice:

On behalf of our members and supporters, Ocean Conservancy¹ submits these brief comments on the Bureau of Land Management's (BLM) Notice of Intent to Prepare an Integrated Activity Plan (IAP) and Environmental Impact Statement for the National Petroleum Reserve in Alaska (Reserve).

If BLM proceeds with its plan to prepare a new IAP and Environmental Impact Statement,² the agency should:

- Recognize the importance of coastal and marine areas in and around the Reserve;
- Maintain or expand existing protections for existing Special Areas in the Reserve; and
- Identify and incorporate the best available information, including information on marine wildlife.

Recognize the importance of coastal and marine areas in and around the Reserve.

The Reserve is inextricably linked with the larger Arctic ecosystem, including its coastal and marine components. The Reserve includes important terrestrial and freshwater areas as well as portions of the Chukchi and Beaufort Sea coasts. These coastal areas and adjacent marine waters support an abundance and diversity of marine species, including iconic Arctic marine mammals. In addition, fish species—such as Dolly Varden, broad whitefish and Arctic cisco—use both freshwater habitats in the Reserve and saltwater habitats in estuaries and along the coast. The Reserve also hosts birds that use both terrestrial and marine areas. Millions of migratory birds rest, feed, stage and molt in the Reserve's coastal waters, or nest on the barrier islands or inland in wetland habitats. Many of these same species—such as red phalaropes, three species of jaegers, and yellow-billed loons—spend

¹ Ocean Conservancy works to protect the ocean from today's greatest global challenges. Together with our partners, we create science-based solutions for a healthy ocean and the wildlife and communities dependent on it.

² We urge BLM to consider carefully whether a new IAP is warranted and if so, to explain clearly the justification for it.

the rest of the year at sea. These coastal areas provide important subsistence for communities in the region. If BLM proceeds with its plan to prepare a new IAP and Environmental Impact Statement, it must consider the impacts of management changes on the broader Arctic ecosystem, including its coastal and marine components.

Maintain or expand existing protections for Reserve Special Areas

Decisions about management of the Reserve and its resources will affect important coastal and marine habitats. If BLM proceeds with its proposal to prepare a new IAP, the agency should prioritize maintaining important values in the Special Areas, including the Teshekpuk Lake Special Area, Utukok River Uplands Special Area, Colville River Special Area, Kasegaluk Lagoon Special Area and Peard Bay Special Area. While the following paragraphs focus on coastal and marine values of some of these Special Areas, BLM should ensure that any future IAP does not result in diminishment of ecosystem values in any Special Areas.

- The **Kasegaluk Lagoon Special Area** is important for ducks, loons, and marine mammals. Beluga whales give birth to their calves offshore and hundreds of walrus and spotted seals haul out on the barrier islands. During spring and fall migration, beluga whales travel along the Chukchi and Beaufort coastline of the NPRA using areas such as Kasegaluk Lagoon and the Kuk Inlet estuary. Beluga whales are a valuable subsistence resource for several communities in the region. Point Lay and Wainwright have community hunts while Kaktovik, Nuiqsut, and Barrow periodically hunt belugas. Red-throated Loons occur in especially high densities within the vicinity and the barrier islands and spits are included in designated critical habitat for polar bears.
- **Peard Bay Special Area** provides high-density shorebird and waterfowl habitat, and includes abundant high-density nesting areas for ducks including the spectacled eider. Nearby barrier islands and spits provide habitat for polar bears. Peard Bay is also an important haul-out site for spotted seals.
- Coastal areas within the **Teshekpuk Lake Special Area** provide important habitat for marine mammals like polar bears, beluga whales and spotted seals. Other marine mammal species—including bowhead whales and bearded, ribbon and ringed seals—rely upon adjacent state and federal ocean waters that may be influenced by Teshekpuk Lake Special Area management decisions. Maintaining terrestrial protections in areas adjacent to the Arctic marine environment offers an important buffer from impacts that could spill over to affect the coastal and marine environments.

If BLM goes forward with its plan to prepare a new IAP and Environmental Impact Statement, it should ensure that strong management measures, including no-leasing zones, are in place to protect the values associated with these and other Reserve Special Areas.

Identify and incorporate the best available information, including information on marine wildlife.

If BLM proceeds with this process, it should seek out and incorporate the best available information, including new information about marine wildlife such as walrus, polar bears, and ice-dependent seals. For example, as opportunities for hauling out on sea ice decline, walruses are increasingly hauling out on the coast. BLM must consider this new pattern of use and should seek out information about how walruses use these coastal haulout areas and what additional protections may be required. In addition, BLM should incorporate new information

about ice-dependent seals in the region and consider whether this new information merits expansion of protections or imposition of additional precautionary measures.

Thank you for the opportunity to submit scoping comments on BLM's proposal to prepare a new IAP and associated Environmental Impact Statement. If BLM moves forward with this process, we urge the agency to consider the importance of the Reserve's marine and coastal values, and to maintain or expand safeguards for those and other ecosystem values.

Sincerely,

A handwritten signature in blue ink, appearing to read "Andrew Hartsig", is positioned above a horizontal line.

Andrew Hartsig
Director, Arctic Program
Ocean Conservancy